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June 28, 2019

VIA ECF

The Honorable Sanket J. Bulsara
United States District Court
Eastern District of New York
225 Cadman Plaza East
Chambers 304 North, Courtroom 324N
Brooklyn, New York 11201

**Re: Ellen McCormick v. Phinizy & Phebe Handmade LLC, et al.
Case No. 18-cv-00916 (ENV)(SJB)**

Dear Judge Bulsara,

We represent the Plaintiff Ellen McCormick ("Plaintiff") in the above-referenced matter. We write in response to the Court's June 18, 2019 Order directing Plaintiff to demonstrate compliance with the Local Rule 7.1 and 55.2 in regards to the Default Judgment (ECF Entry No. 23) ("Motion") or to refile said motion. Plaintiff respectfully requests permission to withdraw the motion, and re-file it upon the completion of service upon Defendant Jess Eddie which is, as previously referenced, being coordinated with counsel abroad.

As to Defendant Crista Freeman's June 20, 2019 letter to the Court (the "June 20 Letter"), we believe that it addresses prospects of adjudication on the merits – procedural or otherwise – and is not proper for consideration or relevant at this time. Should the Court find otherwise, of course, we would be pleased to provide a response to the June 20 Letter. We thank the Court for its continued time and attention to this matter and please do not hesitate to contact our office with any questions or concerns.

Respectfully Submitted,

/s/ Patrick J. Boyd

Patrick J. Boyd, Partner
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